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January 31, 2015

BY ELECTRONIC MAIL

The Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Ross Ulbricht,
14 Cr. 68 (KBF)

Dear Judge Forrest:

This letter is submitted on behalf of Ross Ulbricht, whom I represent in the above-captioned case, in response to the Court's January 31, 2015, Orders requiring the defense to disclose any exhibits it proposes to use to the government by 5 p.m. today, and to make any additional submissions regarding defendant's proposed expert witness Andreas M. Antonopoulos by 2 p.m.

In light of the fact that Joshua L. Dratel, Esq., lead counsel for Mr. Ulbricht observes the Sabbath and will not be able to respond to these Orders, or even view them, until after sundown today and also given that Mr. Antonopoulos is currently in transit back to the United States from Germany (where he has been for the past few days) and thus unreachable until this evening, it is respectfully requested that the Court grant an extension of time until midnight tonight for the filing of any additional submissions regarding Mr. Antonopoulos, and an extension until noon tomorrow to provide the government with exhibits related to defense witnesses. The defense also requests these extensions given its limited resources, in particular in comparison to the government, in the sense that it is defense counsel (not paralegals) that must prepare items such as 3500 material – which we produced to the government in its entirety and in a timely fashion yesterday -- and exhibits. It should also be noted that I left voice mail messages for Assistant

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United States Attorneys Serrin Turner and Timothy Howard to obtain the government's position as to the requested extensions and have not heard back from them at the time of the filing of this letter.

Accordingly, for the above-stated reasons, it is respectfully requested that the Court grant an extension of time until midnight tonight for the filing of any additional submissions regarding Mr. Antonopoulos, and an extension until noon tomorrow to provide the government with exhibits related to defense witnesses.

Respectfully submitted,

Lindsay A. Lewis

LAL/

cc: Serrin Turner
Timothy T. Howard
Assistant United States Attorneys